

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Eddy Alexandre
Petitioner
v.

Case No. 22-CR-326 (JPC)
Hon. Judge John P. Cronan
District Judge

UNITED STATES OF AMERICA
Respondent

MOTION TO RELIEVE COUNSEL ON RECORD OF HIS
DUTIES BECAUSE OF A CONFLICT OF INTEREST

TO THE HONORABLE JUDGE CRONAN:

COMES NOW Eddy Alexandre, (the "Defendant", "Mr. Alexandre"), pro se, and respectfully moves this Honorable Court to relieve counsel on record, Mr. Emil Bove, of his duties because of a conflict of interest. Mr. Alexandre will show this Court as follows:

1. Mr. Alexandre will file a motion to vacate, set aside or correct his sentence under 28 U.S.C section 2255. Counsel Mr. Bove will become a witness on Mr. Alexandre behalf, or a witness against Mr. Alexandre. Either way would require that Attorney Mr. Bove withdraw from the case because of a conflict of interest. Mr. Bove already filed a permissive withdrawal in the civil docket in the same district and the request was GRANTED by Honorable Judge Caproni. Therefore this motion should be granted. See Mr. Alexandre's Notice of Appearance attached.

2. Mr. Alexandre further submits that, if counsel Mr. Bove disputes Mr. Alexandre's facts then he represents conflicting interest, and if he agrees with Mr. Alexandre's facts, then he failed to perform his official duties constituting ineffective assistance of counsel. See Lopez v. Scully, 58 F.3d 38 (2nd Cir. 1995). "Any contention by counsel that defendant's allegations were not true would... contradict his client." Cleaned up. The court remanded for resentencing with appointment of new counsel.

WHEREFORE, based on the above, Mr. Alexandre urges this Court to GRANT this motion and relieve counsel Mr. Emil Bove of his duties or in the alternative to GRANT a permissive withdrawal.

Respectfully submitted on this 10th day of June, 2024.

Eddy Alexandre

/S/

Eddy Alexandre, pro se
ex-CEO and founder of EminiFX, Inc.
Reg. No.: 00712-510
FCC Allenwood-Low
P.O. Box 1000
White Deer, PA 17887
LEGAL-MAIL: Open only in the
presence of the inmate

CERTIFICATE OF SERVICE

I, Eddy Alexandre, hereby declare under the penalty of perjury, pursuant to 28 U.S.C. section 1746, that on this date I caused a true and complete copy of this motion to relieve counsel to be served, in placing same in a sealed envelope, and routing it for mailing certified, via first class United States mail with a return receipt, postage thereon fully prepaid, a true copy thereof to the following interested party:

The Clerk of Court
United States District Court
Southern District Court of New York
U.S. Courthouse - 500 Pearl Street
New York, NY 1007

DATED: 6/4/2024

Eddy Alexandre

/S/

Eddy Alexandre, pro se
ex-CEO, founder of EminiFX, Inc
Reg. No.: 00712-510
P.O. Box 1000
White Deer, PA 17887

CERTIFIED



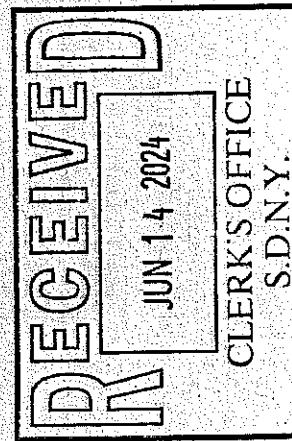
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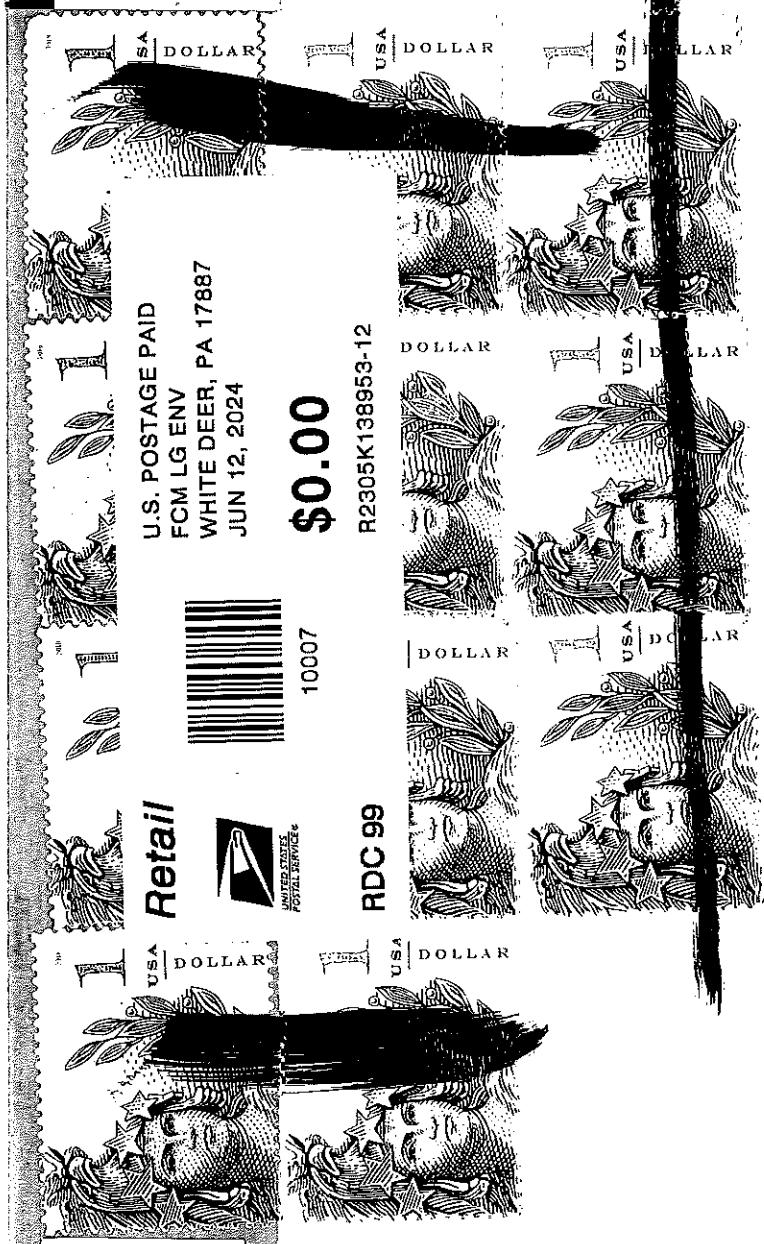
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